# UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:	)	Case No. 09-25416
	)	
ISCO INTERNATIONAL, INC.,	)	Honorable John H. Squires
	)	
Debtor.	)	Chapter 11

### **NOTICE OF MOTION**

To: M. Gretchen Silver, Office of the United States Trustee, 219 S. Dearborn St., Suite 873, Chicago, IL 60604; fax no. 312-886-5794

Scott D. H. Redman, Crowley, Barrett & Karaba, Ltd., Two First National Plaza, 20 S. Clark St., Suite 2310, Chicago, IL 60603; fax no. 312-726-2741

Jolene M. Wise, Securities and Exchange Commission, 175 W. Jackson Blvd., Suite 900 Chicago, IL 60604; fax no. 312-353-7398

Jim Elsman, D&K Elk Grove Industrial II, LLC, Draper & Kramer, Inc., 921 Busse Road, Elk Grove Village, IL 60007; fax no. 847-640-7218

PLEASE TAKE NOTICE that on the 11<sup>th</sup> day of March, 2010, at 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable John H. Squires in Courtroom 680 in the United States Courthouse, 219 S. Dearborn, Chicago, Illinois, or before any other Bankruptcy Judge who may be presiding in said Judge's place and stead, and shall then and there move the Court for the entry of an order in accordance with the attached motion at which time you may appear if you so desire.

/s/ Joel A. Schechter

#### **CERTIFICATE OF SERVICE**

The undersigned being first duly sworn on oath deposes and says that she served the above and foregoing notice and attached motion on the above parties via fax transmission on the 5<sup>th</sup> day of March, 2010, before the hour of 5:00 p.m. from 53 W. Jackson Blvd., Chicago, Illinois 60604.

/s/ Angie Zaric Baltrukonis

Joel A. Schechter Attorney No. 03122099 LAW OFFICES OF JOEL A. SCHECHTER 53 W. Jackson Blvd., Suite 1522 Chicago, Illinois 60604; (312) 332-0267 Case 09-25416 Doc 54 Filed 03/05/10 Entered 03/05/10 17:23:58 Desc Main

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BROADCAST REPORT

TIME : 03/05/2010 17:15 NAME : JOEL A. SCHECHTER FAX : 3129394714 TEL : 3123320267 SER.#: BROL2J847857

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DATE	TIME	FAX NO./NAME	DURATION	PAGE(S)	RESULT	COMMENT
03/05	17:08	13128865794	46	04	무무무무	ECM
03/05	17:09	13127262741	01:53	04		ECM
03/05	17:12	13123537398	56	04		ECM
03/05	17:13	18476407218	01:54	04		ECM

BUSY: BUSY/NO RESPONSE NG : POOR LINE CONDITION CV : COVERPAGE PC : PC-FAX

# UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In Re:	)	Case No. 09-25416
	)	
ISCO INTERNATIONAL, INC.	)	Honorable John H. Squires
	)	
Debtor and Debtor-in-Possession.	)	Chapter 11

### MOTION TO EXTEND TIME TO FILE FINAL FEE APPLICATION

Now Comes the Debtor and Debtor-in-Possession, ISCO International Inc. (Debtor) and its counsel, Joel A. Schechter of the Law Offices of Joel A. Schechter (JAS), and move the Court for the entry of an order extending the time within which JAS has to file a final fee application, and in support thereof state as follows:

- 1. That on July 14, 2009, the Debtor filed a voluntary petition pursuant to Chapter 11 of Title 11, United States Code.
- 2. That on December 1, 2009, the Debtor filed its first amended disclosure statement and its first amended Chapter 11 plan.
- 3. That on December 22, 2009, this Honorable Court entered an order confirming the Debtor's first amended Chapter 11 plan of reorganization.
- 4. That the confirmation order provided for retention of the Court's jurisdiction to consider various matters post-confirmation including, but not limited to, applications for compensation and reimbursement of expenses.
- 5. That the Debtor's first amended Chapter 11 plan provided for fee applications to be filed within sixty (60) days of the effective date of the confirmation of the plan, which date is February 22, 2010 (February 20 being a Saturday).

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6. That on March 2, 2010, the Court entered an order extending the time for JAS to

file his final fee application to and including March 5, 2010.

7. That due to other matters requiring immediate attention, the fee application could

not be completed by March 5, 2010.

8. That the Debtor and JAS request an extension of time to file a final fee application

and hereby request that the Court enter an order extending the time to file the final fee

application on or before March 11, 2010, and

9. That the Debtor and JAS believe that no party in interest will be prejudiced by this

extension request.

WHEREFORE, the Debtor, ISCO International, Inc. and JAS of the Law Offices of Joel

A. Schechter, pray the Honorable Court enter an order extending the time within which JAS has

to file a final fee application to and including March 11, 2010 and for such other and further

relief as the Court may deem just and proper.

Respectfully submitted,

ISCO International Inc., Debtor

and Debtor-in-Possession

By: Joel A. Schechter

Its Attorney

Joel A. Schechter Attorney No. 03122099 LAW OFFICES OF JOEL A. SCHECHTER 53 W. Jackson Blvd., Suite 1522 Chicago, IL 60604; (312) 332-0267